

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 07CV6286 (GRD)

JUSTA C. MORALES, as personal  
representative of the ESTATE of  
GUSTAVO A. MORALES

Plaintiff,

v.

CITIGROUP, INC. f/k/a THE NATIONAL CITY  
BANK OF NEW YORK,

Defendant;

CITIGROUP, INC. f/k/a THE NATIONAL CITY  
BANK OF NEW YORK,

Counter-plaintiff,

v.

JUSTA C. MORALES, as personal  
representative of the ESTATE of  
GUSTAVO A. MORALES,  
JANE DOES 1 – X, and JOHN DOES 1 - X,

Counter-defendants.

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**NOTICE OF TAKING TELEPHONIC DEPOSITION**

**PLEASE TAKE NOTICE** that Defendant/Counter-Plaintiff, Citigroup, Inc., will take the deposition of the below-named individual on the date and at the hour indicated below via telephone, call-in information: (877) 699-4804; Participant ID: 786 924 5248.

**NAME:** Gustav Morales  
**DATE:** Monday, March 17, 2008  
**TIME:** 1:00 A.M.  
**PLACE:** Pat Carl & Associates  
4527 Sunset Ridge  
Minneapolis, Minnesota 55401

The deposition will be taken before a Notary Public or any officer authorized to administer oaths by the laws of the State of Minnesota, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

The deposition is to be taken pursuant to Rule 30 of the Federal Rules of Civil Procedure. The oral examination will continue from hour to hour and from day to day until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for any other purpose permitted under the Federal Rules of Civil Procedure.

Dated: February 22, 2008.

Respectfully submitted,

/s/ Edward M. Mullins

**ASTIGARRAGA DAVIS MULLINS &  
GROSSMAN, P.A.**

José I. Astigarraga, Edward M. Mullins, &  
Jenelle La Chuisa

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 22, 2008, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system and that notice was delivered, via U.S. mail, postage prepaid, to **Omar Ortega, Esq.**, Dorta & Ortega, P.A., 2222 Ponce de Leon Blvd., Suite 306, Coral Gables, FL 33134.

/s/ Edward M. Mullins

Edward M. Mullins

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